

### REMARKS

Claims 1-19, 21-41, and 43-57 stand rejected in the Office Action dated November 19, 2008 ("Office Action"). Claims 1, 12, 13, 14, 16, 19, 23, 34-36, 38, 39, 45-47, 52, and 56 are currently amended. Claims 20 and 42 are canceled. Thus, claims 1-19, 21-41, and 43-57 are currently pending in the application. Claims 1, 12, 19, 23, 34, 41, 45, and 56 are independent. No new matter is added to the application by the claim amendments. For example, the amendments to claim 1 are supported by paragraph 119 and other paragraphs of the original specification. Reconsideration of the claims in view of the following remarks is respectfully requested.

### ***Claim Rejections – 35 U.S.C. § 102***

Claims 1, 4-19, 21-23, 26-41 and 43-57 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 7,380,120 to Garcia ("*Garcia*"). The rejection is respectfully addressed.

Claim 1, as amended, recites, among other things:

receiving a request from a client to take an action with respect to a first electronic document, the action unrelated to a second electronic document; and synchronizing offline access information with the client, in response to the request, to pre-authorize the client, to allow actions by a user as a member of a group of users, by sending to the client an update to offline access information retained at the client, the update comprising a first key associated with the group, the first key being useable at the client to access the second electronic document while offline by decrypting a second key in the second electronic document.

*Garcia* has not been shown to disclose at least these claimed features. For example, the portion of *Garcia* cited by the Office Action (*i.e.*, column 33, lines 1-55) does not describe providing offline access to an electronic document in response to a request ***to take an action that is unrelated to the electronic document for which offline access is provided.*** Instead, according to Fig. 7B of *Garcia* and the corresponding description (at 32:47 to 34:15), a server provides off-line access to selected documents in response to a client request for offline access ***for those selected documents.*** For example, *Garcia* explains that "[w]hen a user has decided to be away from a company's premises for a certain period and will need to access some secured documents

in a client machine ... [a] preauthorization request is made in the client machine to seek an approval of an off-line access request for a server.” *Garcia* at 32:50-57. After the server processes the off-line access request, “the user’s access privilege or the access rules *in the selected secured documents* [are] updated for the requested period.” *Id.* at 33:17-19, emphasis added. Thus, *Garcia* does not describe providing offline access to an electronic document in response to a request to take an action that is unrelated to that electronic document. However, as explained with respect to one example in the present application,

The request 1130 can be any type of request sent to the server 1120 periodically, such as a request from the client 1110 to take an action with respect to a document 1135, which may be located at the client 1110 or elsewhere and may be a secured document or not. The server 1120 can verify an authenticated user at the client 1110 in connection with the request 1130, and this verification of an authorized user can cause the synchronization operation to initiate. For example, the server 1120 can be a server such as any described above, and *the synchronization operation can piggyback on other operations that use authentication* (e.g., when a user attempts to access or secure a document while online).

Present Application, ¶ 119, emphasis added.

For at least the reason that *Garcia* has not been shown to disclose the limitations of claim 1, the rejection of claim 1 is deficient. Claims 4-11 depend from claim 1 and include all of its limitations. For at least the same reasons that the rejection of claim 1 is deficient, the rejection of claims 4-11 is also deficient. Accordingly, Applicants respectfully request that the rejection of claims 1 and 4-11 be withdrawn.

Claim 12, as amended, recites, among other things:

receiving a request to take an action with respect to a first electronic document, the action unrelated to a second electronic document;

synchronizing offline access information with a document control server in response to the request, when online, to pre-authorize offline access to a second electronic document, the synchronizing comprising receiving an update to offline access information retained locally, the update comprising a first key associated with a group of users of the document control server.

For at least the reasons discussed above with regard to claim 1, the rejection of claim 12 is deficient. Claims 13-18 depend from claim 12 and include all of its limitations. For at least the same reasons that the rejection of claim 12 is deficient, the rejection of claims 13-18 is also

deficient. Accordingly, Applicants respectfully request that the rejection of claims 12-18 be withdrawn.

Claim 19 recites, among other things, among other things:

incorporating into the encrypted electronic document an address of a document control server, document-permissions information, and an encryption key useable in decrypting the encrypted electronic document, the encryption key being encrypted with a key generated by, and associated with a group of users of, the document control server.

*Garcia* has not been shown to disclose at least these claimed features. For example, the portions of *Garcia* cited by the Office Action (*i.e.*, Fig. 2C.3, 15:30-67, and 28:35-60) do not describe incorporating into an encrypted electronic document an address of a document control server. Instead, the cited portion of *Garcia* describes a header 266 that does not include an address of a document control server. *See Garcia*, Fig. 2C.3 and 15:33-65. The header 266 includes a user key, a file key 270, access rules, group IDs, and a number of other items that do not include an address of a document control server. Moreover, *Garcia's* description of the authentication process at column 28, lines 35-60 fails to describe incorporating an address of a document control server into an encrypted electronic document.

Thus, *Garcia* has not been shown to disclose the limitations of claim 19. For at least this reason, the rejection of claim 19 is deficient. Claims 21 and 22 depend from claim 19 and include all of its limitations. For at least the same reasons that the rejection of claim 19 is deficient, the rejection of claims 21 and 22 is also deficient. Accordingly, Applicants respectfully request that the rejection of claims 19, 21, and 22 be withdrawn.

Claim 23, as amended, recites, among other things:

receiving a request from a client to take an action with respect to a first electronic document, the request unrelated to a second electronic document; and synchronizing offline access information with the client, in response to the request, to pre-authorize the client, to allow actions by a user as a member of a group of users, by sending to the client an update to offline access information retained at the client, the update comprising a first key associated with the group, the first key being useable at the client to access the second electronic document while offline by decrypting a second key in the second electronic document.

For at least the reasons discussed above with regard to claim 1, the rejection of claim 23 is deficient. Claims 26-33 depend from claim 23 and include all of its limitations. For at least the same reasons that the rejection of claim 23 is deficient, the rejection of claims 26-33 is also deficient. Accordingly, Applicants respectfully request that the rejection of claims 23 and 26-33 be withdrawn.

Claim 34, as amended, recites, among other things:

receiving a request to take an action with respect to a first electronic document, the action unrelated to a second electronic document;  
synchronizing offline access information with a document control server in response to the request, when online, to pre-authorize offline access to the second electronic document, the synchronizing comprising receiving an update to offline access information retained locally, the update comprising a first key associated with a group of users of the document control server

For at least the reasons discussed above with regard to claim 1, the rejection of claim 34 is deficient. Claims 35-40 depend from claim 34 and include all of its limitations. For at least the same reasons that the rejection of claim 34 is deficient, the rejection of claims 35-40 is also deficient. Accordingly, Applicants respectfully request that the rejection of claims 34-40 be withdrawn.

Claim 41 recites, among other things:

incorporating into the encrypted electronic document an address of a document control server, document-permissions information, and an encryption key useable in decrypting the encrypted electronic document, the encryption key being encrypted with a key generated by, and associated with a group of users of, the document control server.

For at least the reasons discussed above with regard to claim 19, the rejection of claim 41 is deficient. Claims 43 and 44 depend from claim 41 and include all of its limitations. For at least the same reasons that the rejection of claim 41 is deficient, the rejection of claims 43 and 44 is also deficient. Accordingly, Applicants respectfully request that the rejection of claims 41, 43, and 44 be withdrawn.

Claim 45, as amended, recites, among other things:

a document control server that:

receives a client request to take an action with respect to a first electronic document, the client request unrelated to a second electronic document; and

synchronizes offline access information with the client in response to the client request, to pre-authorize offline access to the second electronic document by sending an update to the offline access information retained at the client, the update comprising a first key associated with a group, the first key being useable at the client to access the second electronic document by decrypting a second key in the second electronic document.

For at least the reasons discussed above with regard to claim 1, the rejection of claim 45 is deficient. Claims 46-55 depend from claim 45 and include all of its limitations. For at least the same reasons that the rejection of claim 45 is deficient, the rejection of claim 46-55 is also deficient. Accordingly, Applicants respectfully request that the rejection of claims 45-55 be withdrawn.

Claim 56, as amended, recites, among other things:

server means for receiving client requests to take an action with respect to a first electronic document, the action unrelated to a second electronic document;

server means for transparently synchronizing offline access information for the second electronic document in response to the client requests to pre-authorize the client, to allow offline actions by a user as a member of a group of users, by sending to the client an update to offline access information retained at the client, the update comprising a first key associated with the group, the first key being useable at the client to access the second electronic document while offline by decrypting a second key in the second electronic document.

For at least the reasons discussed above with regard to claim 1, the rejection of claim 56 is deficient. Claim 57 depends from claim 56 and includes all of its limitations. For at least the same reasons that the rejection of claim 56 is deficient, the rejection of claim 57 is also deficient. Accordingly, Applicants respectfully request that the rejection of claims 56-57 be withdrawn.

### *Claim Rejections – 35 U.S.C. § 103*

Claims 2-3 and 24-25 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Garcia* in view of Official Notices. Applicants respectfully traverse the rejections and both Official Notices. Claims 2-3 depend from claim 1 and include all of its limitations. For at least the reasons that the rejection of claim 1 is deficient, the rejection of

claims 2-3 is also deficient. Moreover, the Official Notices taken with respect to claims 2-3 are improper and have not been applied to overcome the deficiencies of *Garcia*. Claims 24-25 depend from claim 23 and include all of its limitations. For at least the reasons that the rejection of claim 23 is deficient, the rejection of claims 24-25 is also deficient. Moreover, the Official Notices taken with respect to claims 24-25 are improper and have not been applied to overcome the deficiencies of *Garcia*.

Applicants traverse the Office Action's assertions on page 10 that "the USE of comparing times to determine whether to update or not was conventional and well known" and "the USE of comparing membership was conventional and well known" to the extent that it constitutes Official Notice that the described technical features are well known in the art. Applicants note that "assertions of technical facts in the areas of esoteric technology or specific knowledge of the prior art must *always* be supported by citation to some reference work recognized as standard in the pertinent art." M.P.E.P. § 2144.03(A) (emphasis added). Therefore, Applicants respectfully request that either the Examiner come forward with such required support or that the assertion and the rejection of Claims 2-3 and 24-25 be removed accordingly.

### CONCLUSION

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

If the present application is not allowed and/or if one or more of the rejections is maintained, Applicants hereby request a telephone conference with the Examiner and further request that the Examiner contact the undersigned agent to schedule the telephone conference.

No additional fees are believed due at this time. However, if Applicants are incorrect, please apply any necessary charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

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